

SHAW KELLER

LLP

Karen E. Keller
I.M. Pei Building
1105 North Market St., 12th Floor
Wilmington, DE 19801
(302) 298-0702
kkeller@shawkeller.com

August 27, 2025

VIA CM/ECF & FEDEX

The Honorable Jennifer Choe-Groves
Clerk of Court
United States Court of International Trade,
One Federal Plaza
New York, NY 10278-0001

Re: *Digital Media Technology Holdings, LLC v. Deluxe Media Inc.*,
C.A. No. 25-038-JCG

Dear Judge Choe-Groves:

I write on behalf of the defendant, Deluxe Media, Inc. (“Deluxe Media”), to inform the Court that in IPR2024-00736, *Disney Media & Entertainment Distribution LLC v. Digital Media Technology Holdings, LLC*, the Patent Trial & Appeal Board has determined that claims 1, 4–7, 9, and 11 of U.S. Patent No. 7,574,725 are unpatentable. *See* Ex. A (Final Written Decision dated August 25, 2025).

In the above-captioned litigation pending before Your Honor, Deluxe Media has challenged all claims (claims 1-23) of the ‘725 patent as unpatentable under 35 U.S.C. § 101. *See* D.I. 13, 20 and 21 (motion to dismiss briefing). The IPR decision does not dispose of this case, and therefore, the motion to dismiss remains pending before Your Honor.

Should Your Honor have any questions or concerns, counsel are available at the Court’s convenience.

Respectfully submitted,

/s/ *Karen E. Keller*

Karen E. Keller (No. 4489)

cc: Clerk of the Court (by CM/ECF & Hand Delivery)
All counsel of record (by CM/ECF & Email)